

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Obj. Deadline: January 10, 2025 at 4:00 p.m. (ET)**

**Hearing Date: January 21, 2025 at 1:00 p.m. (ET)**

**NOTICE OF MOTION OF BDPM GROUP, LLC TO COMPEL IMMEDIATE  
PAYMENT OF STUB RENT AND POST-PETITION RENT AND OBLIGATIONS  
PURSUANT TO 11 U.S.C. §§ 365(d)(3) AND 503(b)(1)(A)**

**PLEASE TAKE NOTICE** that on December 27, 2024, BDPM Group, LLC, through undersigned counsel, filed the *Motion of BDPM Group, LLC to Compel Immediate Payment of Stub Rent and Post-Petition Rent and Obligations Pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1)(A)* (the “Motion”) with United States Bankruptcy Court for the District of Delaware (the “Court”).

**PLEASE TAKE FURTHER NOTICE** that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court for the District of Delaware, filed with the Bankruptcy Court on or before **January 10, 2025 at 4:00 p.m. (ET)** (the “**Objection Deadline**”). At the same time, you must also serve a copy of the response upon undersigned counsel.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing on the Motion is scheduled for **January 21, 2025 at 1:00 p.m. (ET)** (the “**Hearing**”) before the Honorable J. Kate Stickles, United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5<sup>th</sup> Floor, Courtroom #6, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH PLEADINGS WITHOUT FURTHER NOTICE OR HEARING.**

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<sup>1</sup> The debtors and debtors-in-possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores – PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores – CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163) INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. DublinGranville Road, Columbus, OH 43081.

Dated: December 27, 2024

**MORRIS JAMES LLP**

/s/ Christopher M. Donnelly

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